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Attorneys for Defendant
TEXAS TIMBERJACK, INC.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

ROCK & DIRT ENVIRONMENTAL, INC. §
an Alaska corporation, §

Plaintiff, §

v. §

TEXAS TIMBERJACK, INC., a Texas §
corporation, §

Defendant. §

CASE 4:11-cv-00014-RRB

JOINT STATUS REPORT TO COURT

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Rock & Dirt Environmental, Inc., an Alaska corporation, Plaintiff, and Texas Timberjack, Inc., a Texas corporation, Defendant, and hereby make this Joint Status Report to Court, and would respectfully show unto the Honorable Court as follows:

1.

On February 23, 2012, the Court granted the Parties' Joint Request for Stay, as the Parties informed the Court that they were attempting in good faith to resolve this matter by way of settlement. Temperatures and weather delayed Defendant's inspection of the equipment at issue for a period of time. Defendant's inspection has now occurred. Therefore, the Parties expect to promptly enter into a settlement letter agreement and, pending final drafting of necessary settlement documentation, expect for this matter to be finalized and disposed of (via settlement) shortly thereafter. Accordingly, the Parties do not believe the stay issued by the Court on February 23, 2012 needs to be lifted at this time and respectfully request the stay currently issued remain in full force and effect until April 20, 2012.

WHEREFORE, PREMISES CONSIDERED, Rock & Dirt Environmental, Inc., an Alaska corporation, Plaintiff, and Texas Timberjack, Inc., a Texas corporation, Defendant, respectfully pray that the Court allow the stay of this case to continue until April 20, 2012, while the parties complete settlement of this matter.

Respectfully Submitted,

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/s/ Brett M. Hill
John P. Ahlers, ABA #0707048
Brett M. Hill, WSBA #35427
(admitted Pro Hac Vice)
ATTORNEYS FOR PLAINTIFF

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CO-COUNSEL FOR DEFENDANT TEXAS
TIMBERJACK, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been forwarded to all known counsel of record in this cause in accordance with the Federal Rules of Civil Procedure on this 30th day of March 2012.

/s/Howard Lazar
HOWARD LAZAR

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